

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LESHAWN DAWSON, on behalf of himself and :
all others similarly situated, : Civil Action No. 1:19-cv-01433
:
Plaintiffs, : STIPULATION OF SETTLEMENT
v. : AND [PROPOSED] ORDER OF
: DISMISSAL
SHOEDAZZLE.COM, INC., :
Defendant. :
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WHEREAS, the parties have resolved the issues alleged in the complaint in this action, and have negotiated in good faith for that purpose; and

WHEREAS, none of the parties in the above-captioned action is an infant or incompetent person; and

WHEREAS, the parties in the above-captioned action wish to discontinue the litigation; IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the parties as follows:

1. The parties hereby agree that the above-captioned action is dismissed and discontinued with prejudice, as to the named defendant, pursuant to Rule 41(a) of the Federal Rules of Civil Procedure.
2. Any and all claims for damages by plaintiff which are subject of this action or otherwise arise out of any incidents alleged in the Complaint are hereby settled against the named defendant.

3. Nothing in this Stipulation of Settlement or Order shall be construed as an admission or concession of liability whatsoever by the named defendant regarding any of the allegations made by plaintiff in the Complaint.
4. This Stipulation of Settlement and any Order entered thereon shall have no precedential value of effect whatsoever and shall not be admissible in any other action or proceeding as evidence or for any other purpose except in an action or proceeding to enforce the parties Confidential Settlement Agreement.

Dated: June 6, 2019

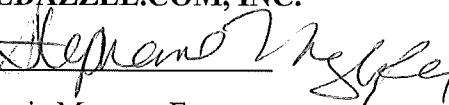
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Dated: June 6, 2019

SHOEDAZZLE.COM, INC.

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ATTORNEY FOR DEFENDANT

ATTORNEYS FOR PLAINTIFF

SO ORDERED.

Hon. Alison J. Nathan
United States District Judge